

AARON D. FORD  
Attorney General  
LAURA M. GINN (Bar No. 8085)  
Deputy Attorney General  
State of Nevada  
100 N. Carson Street  
Carson City, NV 89701-4717  
Tel: (775) 684-1120  
E-mail: LGinn@ag.nv.gov

*Attorneys for Gregory Bryan, Gregory Martin,  
and Bob Faulkner*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FREDERIC GREEN,

Plaintiff,

v.

DR. MICHAEL MINEV, *et al.*,

Defendants.

Case No. 2:19-cv-01889-GMN-BNW

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
MOTION FOR SUMMARY JUDGMENT**

Defendants Gregory Bryan, Gregory Martin, and Bob Faulkner, by and through counsel, Aaron D. Ford, Attorney General for the State of Nevada, and Laura M. Ginn, Deputy Attorney General, hereby move this Court for an extension of time file a Motion for Summary Judgment. This Motion is made and based upon Federal Rule of Civil Procedure 6(b)(1)(A), the attached Points and Authorities, the papers, and pleadings on file herein, and such other and further information as this Court may deem appropriate.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Courts have inherent powers to control their dockets, *see Ready Transp., Inc. v. AAR Mfg, Inc.*, 627 F.3d 402, 404 (citations omitted), and to “achieve the orderly and expeditious disposition of cases.” *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991) “Such power is indispensable to the court’s ability to enforce its orders, manage its docket, and regulate insubordinate [] conduct. *Id.* (See also *Mazzeo v. Gibbons*, No. 2:08–cv01387–RLH–PAL, 2010 WL 3910072, at \*2 (D.Nev.2010)).

1 LR IA 6-1 discusses requests for continuances. The rule states:

2 (a) A motion or stipulation to extend time must state the reasons  
3 for the extension requested and must inform the court of all  
4 previous extensions of the subject deadline the court granted.  
5 (Examples: "This is the first stipulation for extension of time to  
6 file motions." "This is the third motion to extend time to take  
7 discovery.")

8 This is the first request and is requested for good cause. Former Senior Deputy  
9 Attorney General (SDAG) Brady was responsible for this case and recently left the Office  
10 of the Attorney General on September 17, 2021. As a result of former SDAG Brady leaving,  
11 this case is being reassigned to Deputy Attorney General Laura M. Ginn.

12 Counsel submits that the recent change of attorney responsible for this case  
13 constitutes good cause for granting an extension of time to thoroughly review the case and  
14 to file a Motion for Summary Judgment. The undersigned met and conferred with the  
15 Plaintiff via email, and he agreed to the extension.

16 Therefore, Defendants request this Court to extend the deadline from October 4,  
17 2021, to November 4, 2021, to file a Motion for Summary Judgment.

18 DATED this 1st day of October, 2021.

19 AARON D. FORD  
20 Attorney General

21 By: /s/ Laura M. Ginn  
22 Laura M. Ginn (Bar No. 8085)  
23 Deputy Attorney General

24 *Attorneys for Defendants*

25 **Order**

26 **IT IS SO ORDERED**

27 **DATED:** 4:49 pm, October 04, 2021

28 

**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on October 1, 2021, I electronically filed the foregoing, **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR SUMMARY JUDGMENT**, via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

Frederic Green  
6718 Oak Mist Avenue  
Las Vegas, Nevada 89139  
*Plaintiff, Pro Se*

  
\_\_\_\_\_  
an employee of the  
Office of the Nevada Attorney General